

**U.S. BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**In re WALDO ALFARO : CHAPTER 13**  
**ROSITSA MANOLCHEVA :**  
**Debtor(s) : BANKRUPTCY NO. 20-13619**

**OBJECTION TO CERTIFICATION OF DEFAULT**

Debtor(s), Waldo Alfaro and Rositsa Manolcheva, by their attorney, Paul H. Young, Esquire, hereby objects to the Certification of Default filed by **Legacy Mortgage Asset Trust 2020-GS1** on June 19, 2024. Debtors believe they can become current on all post-petition payments due under the April 28, 2021 stipulation with the Lender.

Respectfully submitted,

/s/ Paul H. Young  
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